

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

CAROLYN PRUITT,

Plaintiff,

DON TERRY ASSOCIATES,

Defendant.

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2:06-CV-809-VPM

REPORT OF PARTIES' PLANNING MEETING

Counsel for the defendant has attempted to conduct a Rule 26 meeting with counsel for the plaintiff. Contact was made by phone on October 16, 17, 18, 19 and 20; contact was made by mail on October 13 and 18. The report below has been drafted by counsel for the defendant :

a. Appearing on behalf of the plaintiff (Carolyn Pruitt):

James V. Green, Esq.

b. Appearing on behalf of the defendant (Don Terry & Associates):

H. Lewis Gillis and Ramadanah Salaam-Jones

1. Trial date: to be set by Court

Pretrial date: to be set by Court

Pre-Discovery disclosures: The parties exchanged pre-discovery disclosure on November 30, 2006 that complied with the information required by Federal Rules of Civil Procedure 26(a)(1).

2. Discovery Plan: The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects:

- a. The incident made the basis of this lawsuit and any injuries or damages received by Plaintiff; all defenses asserted by the Defendant; and such other discovery reasonably necessary for the proof of any issues, claims or defenses in the Complaint or Answer.
 - b. Any and all persons having knowledge, directly or indirectly, regarding any communications or transactions between the plaintiff and the defendant or any of its agents, servants or employees.
 - c. All discovery commenced in time to be completed by July 7, 2007 or not later than two weeks prior to pretrial hearing. All potentially dispositive motions should be filed by August 1, 2007.
 - d. Maximum of 30 interrogatories from the Defendant and 30 from the Plaintiff. [Responses due in accordance with the Federal Rules of Civil Procedure.]
 - e. Maximum of 30 requests for admissions by each party to any party. [Responses due in accordance with the Federal Rules of Civil Procedure.]
 - f. Maximum of 10 depositions by Plaintiff and 10 by Defendant. [Each deposition limited to maximum of eight hours unless extended by agreement of the parties.]
3. Other items:
1. The parties do not request a conference with the Court before entry of the Scheduling Order.
 2. Unless modified by stipulation of the parties, the disclosure of expert witnesses - including in a complete report under Fed R. Civ. P. (26)(2)(b) from any specially retained or employed expert are due:
 - a. From the plaintiff: 90 days prior to trial
 - b. From the defendant: 60 days prior to trial

3. Pre-trial conferences: This case will be ready for pretrial conference in August of 2007.
4. Trial: This case will be ready for trial by September of 2007.
Trial is expected to last 2-3 day(s).
5. Final list of trial witnesses and exhibits under Fed. R. Civ. P. 26(a)(3) must be served and filed.
 - a. By the plaintiff: 30 days prior to trial
 - b. By the defendant: 30 days prior to trial

Objections are to be filed within 14 days after receipt of final lists.

/s/ Ramadanah M. Salaam-Jones

H. LEWIS GILLIS (GIL011)

RAMADANAH M. SALAAM-JONES (SAL026)

Attorneys for the Defendant

OF COUNSEL:

THOMAS, MEANS, GILLIS & SEAY, P.C.

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Montgomery, Alabama 36106

(334) 270-1033

(334) 260-9396 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served via this Court's electronic filing system on this the 20th day of October, 2006.

James V. Green, Esq.
P.O. Box 878
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(205) 621-0301

/s/ Ramadanah M. Salaam-Jones

OF COUNSEL